

Julie Cavanaugh-Bill (State Bar No. 11533)
 Cavanaugh-Bill Law Offices
 Henderson Bank Building
 401 Railroad Street, Suite 307
 Elko, NV 89801
 (775) 753-4357
 julie@cblawoffices.org

William Falk (Utah Bar No. 16678) *Pro Hac Vice Application To Be Filed*
 2980 Russet Sky Trail
 Castle Rock, CO
 (319) 830-6086
 falkwilt@gmail.com

Terry J. Lodge (Ohio Bar No. 29271) *Pro Hac Vice Application To Be Filed*
 316 N. Michigan St., Suite 520
 Toledo, OH 43604-5627
 (419) 205-7084
 tjlodge50@yahoo.com

Attorneys for Reno-Sparks Indian Colony and Atsa koodakuh wyh Nuwu

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

WESTERN WATERSHEDS PROJECT,)	Case No. 3:21-cv-103-MMD-CLB
<i>et al.</i> ,)	
Plaintiffs,)	MOTION FOR EXPEDITED
)	REVIEW
and)	
)	
RENO-SPARKS INDIAN COLONY and ATSA)	
KOODAKUH WYH NUWU/ PEOPLE OF RED)	
MOUNTAIN)	
)	
Plaintiff-Intervenor,)	
v.)	
)	
UNITED STATES DEPARTMENT OF THE)	
INTERIOR, <i>et al.</i> ,)	
)	
Defendants)	
)	

1 and)
 2)
 3 LITHIUM NEVADA CORP.)
 4)
 5 Defendant-Intervenor)
 6 _____)
 7
 8
 9

10 The Reno-Sparks Indian Colony and Atsa koodakuh wyh Nuwu/People of
 11 Red Mountain (together “Plaintiff-Intervenors”), by and through local counsel
 12 Julie Cavanaugh-Bill and out-of-state counsel William Falk and Terry Lodge (who
 13 are submitting *pro hac vice* applications and will comply with LR IA 11-2 within 14
 14 days), hereby move for an expedited review of Plaintiff-Intervenors Motion to
 Intervene.

15 The Plaintiff-Intervenors bring claims that Defendant Bureau of Land
 16 Management (BLM) is in violation of the National Historic Preservation Act’s
 17 Section 106 consultation. Despite this violation, BLM will likely permit, and
 18 Defendant-Intervenor Lithium Nevada Corp. (Lithium Nevada) will contract with,
 19 an archaeological firm to perform destructive mechanical trenching and other
 20 digging operations in connection with the Thacker Pass Lithium Mine Project, as
 21 soon as July 29. The Plaintiff-Intervenors request that the Court make an
 22 expedited ruling on their Motion to Intervene.

23 In the absence of preliminary injunctive relief or a temporary restraining
 24 order, Plaintiff-Intervenors face imminent, irreparable harm. If an expedited ruling
 25 can be made granting the Plaintiff-Intervenor’s Motion to Intervene, then Plaintiff-
 26 Intervenors will quickly move for a Preliminary Injunction against physical

1 disturbance in Thacker Pass. The Plaintiff-Intervenors have proffered their
2 proposed Motion for Preliminary Injunction and attachments along with the
3 instant Motion so the Court can review all of the Plaintiff-Intervenors' arguments.

4 Respectfully submitted this 20th day of July, 2021.
5

6 By: /s/Julie Cavanaugh-Bill
7 Julie Cavanaugh-Bill (State Bar No. 11533)
8 Cavanaugh-Bill Law Offices
9 Henderson Bank Building
10 401 Railroad Street, Suite 307
11 Elko, NV 89801
12 (775) 753-4357
13 julie@cblawoffices.org
14

15 William Falk, Esq (Utah Bar No. 16678)
16 2980 Russet Sky Trail
17 Castle Rock, CO 80101
18 (319) 830-6086
19 falkwilt@gmail.com
20

21 Terry J. Lodge, Esq. (Ohio Bar No. 29271)
22 316 N. Michigan St., Suite 520
23 Toledo, OH 43604-5627
24 (419) 205-7084
25 tjlodge50@yahoo.com
26 Co-Counsel for Intervenors
27

28
29 **CERTIFICATE OF SERVICE**
30

31 I hereby certify that on July 20, 2021, I filed the foregoing using the United States
32 District Court CM/ECF, which caused all counsel of record to be served
33 electronically.

34 By: /s/Julie Cavanaugh-Bill
35 Julie Cavanaugh-Bill (State Bar No. 11533)
36
37

EXHIBIT INDEX

EXHIBIT	DESCRIPTION	# OF PAGES
1	Reno-Sparks Indian Colony and Atsa koodakuh wyh Nuwu's Proposed Motion for Preliminary Injunction	22